

March 25, 2005

Mr. Paul Dabbs
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Dear Paul:

Thank you for the opportunity to comment on the draft of Bulletin 160. As you know, there is much that Friends of the River and all the members of the Public Advisory Committee can enthusiastically support. You and the DWR staff have done a remarkable job of making this current Bulletin 160 more useful, broad-based, and comprehensive than past Bulletins. As you also know, many of us in the environmental caucus still have some deep disagreements with some of the assumptions and conclusions.

Knowing that we are at “zero-hour” in this process, I would like to make just a few comments to the text in Volume 1.

- Page 2-2: In the Vision, I continue to believe that a “high standard of living” is not necessary or desirable. I recommend “healthy economy, healthy environment, healthy standard of living.”
- Page 2-5: Water efficiency and recycling not only contribute to water “sustainability,” they provide greater water “reliability” than other sources of water and are less costly than new supplies. You have done a good job inserting water efficiency in much of the text. I recommend that, in addition to “promoting and implementing IRWM and improving statewide water management systems,” you add “promoting and implementing water efficiency” as the third bullet.
- Page 2-4: I don’t believe the text here ties in with a definition of Public Trust. The definition you use on page 3-31 is accurate. I recommend changing the language in Page 2-4 to reflect what is written on page 3-31.
- Page 2-6: Instead of paraphrasing John Muir, I recommend you use the actual quote. The “web” analogy doesn’t strike me as accurate. Muir wrote, “When you try to pick out anything by itself, you find it hitched to everything else in the universe.”
- Box 2-5: Delta Improvements. I recommend that you insert language that explains that Delta storage and increased pumping is very controversial and not something that the environmental caucus could support.

- Page 2-6: I very much liked the way you described “benefits-based financing” and the challenges ahead. I particularly liked the sentence that “public funds should be used responsibly and not create unfair advantages for private interests.”
- Box 2-7: Using the California Energy Commission’s PIER has an example was excellent.
- Page 3-4, table 3-1: We still have fundamental problems with the characterization of environmental water. The words “includes reuse” doesn’t help explain to the public what is really happening. At the very least, I recommend inserting the following information in your footnote “b”: “Environmental water is used by agricultural and urban water users and does not represent an exclusive use for the environment.”
- Page 3-24: Various programs and planning initiatives are mentioned, but the Sacramento Water Forum is not one of the successful regional planning efforts. We recommend including it.
- Page 3-51: It is NOT the “American River Forum.” It is the “Sacramento Water Forum.”
- Figure 3-2: This map is mislabeled. It is called “map with major rivers and facilities.” However, it only seems to include rivers that have become manmade waterways (i.e. CVP and SWP). We recommend that you include the free flowing portions of California’s rivers.
- Page 4-17: This draft Bulletin 160 states that “total demand for water [in 2030] can vary. On Page 4-18, the draft discusses “preparing for change.” The main problem I have with this approach is that it continues to be re-active, responding to changes over which we have no control. Would it be possible for Volume 4 to take a more visionary, pro-active approach? In other words, I would like to see a positive philosophy for public investment. Bulletin 160 should specifically state that this is a plan that will give priority to those management options that maximize cost effectiveness, help California deal with climate change, improve water quality, enhance the environment, protect the Public Trust, and promote Environmental Justice.
- Page 4-20: we do not see any mention of the role which water pricing can play in water use, including agricultural water use.

Again, thank you for giving us the opportunity to provide these comments.

Sincerely,

Betsy Reifsnider
Friends of the River consultant